

EXHIBIT 2

Steven R. Pounian

From: Kellogg, Michael K. <mkellogg@kelloggghansen.com>
Sent: Thursday, June 6, 2019 6:41 PM
To: Steven R. Pounian; Shen, Andrew C.
Cc: Eugene Ramirez; Trisha Newman; Christina Medina; Sylvia Hernandez; Irma Castellanos; 'Michael Watts'; 'Carter, Sean'; zScott Tarbutton; zRobert Haefele; Goldman, Jerry; Jim Kreindler; Andrew J. Maloney; Megan Benett; John Fawcett; Rapawy, Gregory G.
Subject: RE: In re Terrorist Attacks (PC/Counsel for KSA) Release of Materials

Steve:

We have to determine whether the Arabic language documents can be translated in time. We are checking with our translators and will get back to you promptly.

Michael

From: Steven R. Pounian [mailto:Spounian@kreindler.com]
Sent: Thursday, June 06, 2019 6:02 PM
To: Shen, Andrew C. <ashen@kelloggghansen.com>; Kellogg, Michael K. <mkellogg@kelloggghansen.com>
Cc: Eugene Ramirez <epr@manningllp.com>; Trisha Newman <ten@MANNINGLLP.COM>; Christina Medina <cvm@manningllp.com>; Sylvia Hernandez <sxh@manningllp.com>; Irma Castellanos <ITC@manningllp.com>; 'Michael Watts' <mrw@MANNINGLLP.COM>; 'Carter, Sean' <SCarter1@cozen.com>; Tarbutton, Joseph <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; Kreindler, James <jkreindler@kreindler.com>; Maloney, III, Andrew <amaloney@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>
Subject: RE: In re Terrorist Attacks (PC/Counsel for KSA) Release of Materials

Dear Michael and Andrew,

We have just sent you the documents produced to us by the King Fahad Mosque by separate link.

Could you please advise us immediately regarding whether the Kingdom will withdraw its pending motion and agree to proceed with the two depositions as previously noticed by the Plaintiffs.

Otherwise, Plaintiffs will file an appropriate response and application with the Court tomorrow morning.

Steve

From: Michael Watts <mrw@MANNINGLLP.COM>
Sent: Thursday, June 6, 2019 5:43 PM
To: Shen, Andrew C. <ashen@kelloggghansen.com>; Kellogg, Michael K. <mkellogg@kelloggghansen.com>; Steven R. Pounian <Spounian@kreindler.com>
Cc: Eugene Ramirez <epr@manningllp.com>; Trisha Newman <ten@MANNINGLLP.COM>; Christina Medina <cvm@manningllp.com>; Sylvia Hernandez <sxh@manningllp.com>; Irma Castellanos <ITC@manningllp.com>
Subject: In re Terrorist Attacks (PC/Counsel for KSA) Release of Materials

All,

I have just received permission from my client to permit the release of all materials previously produced to plaintiff's counsel to counsel for the Kingdom of Saudi Arabia. I called Mr. Pounian and informed him of this a moment ago.

I would request, given the short time frame and the travel logistics, that the Court be informed and a joint request made for the depositions to continue as previously noticed.

Thank you all for your patience.

Very respectfully,

Michael R. Watts

Associate



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